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FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas
Acting General Counsel

Kathleen Guith
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Shonkwiler
Assistant General Counsel

Kamau Philbert
Attorney

SUBJECT: MUR 6950 (Joe Walsh for Congress Committee, Inc.)
Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by counsel on behalf of Joe Walsh for Congress Committee, Inc. and Helene M. Miller-Walsh in her official capacity as treasurer (the "Committee"), which we recommend the Commission accept to settle violations of 52 U.S.C. § 30116(f). See Attachment 1. This matter stems from the Committee knowingly accepting \$92,325 in excessive contributions that were untimely reattributed or redesignated or were not subject to reattribution or redesignation. See Certification, MUR 6950 (July 14, 2015) (finding reason to believe that the Committee violated 52 U.S.C. § 30116(f) and authorizing pre-probable cause conciliation).

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10 We recommend that the Commission accept the attached signed conciliation agreement
11 with the Committee and close the file in this matter.
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15 **RECOMMENDATIONS:**

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17 1. Accept the attached signed conciliation agreement with Joe Walsh for Congress
18 Committee, Inc. and Helene M. Miller-Walsh in her official capacity as treasurer.
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20 2. Approve the appropriate letter.
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22 3. Close the file.
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² The Commission has accepted agreements with similar language when a committee has limited or no funds. *See, e.g.*, MUR 6887 (McCotter) (approving \$5,000 civil penalty — reduced from \$23,000 — from defunct committee with no cash on hand and limited ability to raise additional funds where candidate withdrew from election and had not run again); MUR 6230 (Wynn for Congress) (approving \$8,000 civil penalty — reduced from \$43,000 — from committee with no cash on hand where the retired candidate agreed to pay the \$8,000 penalty, and to pay an additional \$12,000 penalty and refund \$115,000 in excessive contributions should he run again).

³ *See, e.g.*, MUR 6230 (Wynn for Congress) (approving conciliation agreement with contingent refund/disgorgement requirement); MUR 6235 (Cannon for Congress) (same).